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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
77 WEST JACKSON BOULEVARD
CHICAGO, IL 60604-3590

REPLY TO THE ATTENTION OF:

July 16, 1992

Mr. Patrick Doyle
North Shore Gas Co./
Peoples Gas
122 South Michigan Ave.
Room 1035
Chicago, IL 60603

Re: Comments on PRGs and ARARs, Waukegan Manufactured Gas
and Coke Plant Site

Dear Mr. Doyle:

Attached are U.S. EPA comments on Barr Engineering's draft Technical Memorandum for Preliminary Remediation Goals (PRGs) and Applicable or Relevant and Appropriate Requirements (ARARs). These comments will be useful in the development of phase II objectives. The identification of ARARs is an iterative process as more information is gathered about the site conditions. These comments do not constitute an Agency determination concerning the final ARARs for this site.

If you have any questions concerning these comments, please feel free to contact me.

Sincerely,


Cindy J. Nolan
Remedial Project Manager

Enclosures: Jan. 1992 draft Waukegan RAP
IEPA Ground Water Regulation

cc:

Jim Langseth, Barr Engineering
Tracey Fitzgerald, IEPA (w/o attachments)
Rick Hersemann, PRC
Sean Mulroney, ORC (w/o attachments)

U.S. EPA Comments:

Draft Technical Memorandum: Preliminary Remediation Goals (PRGs) and Applicable or Relevant and Appropriate Requirements (ARARs)

1. p 3. The coal seam must be included as a residual waste.
2. p. 11. Preliminary Remedial Action Objectives must include a fourth objective regarding protection of the environment, particularly the aquatic environment. This is recognized in other portions of the text, but needs to be recognized in the Objectives section.
3. p. 19. Chemicals of Concern section needs a rationale for selection discussion, particularly why phenol (noted on page 4) is not listed and why additional inorganics are not included either. Since groundwater discharge is to surface water and the ARARs for these contaminants are generally low, these contaminants may be of greater concern at this site than other sites of this chemical nature.
4. p. 20. Last paragraph refers to the mixing zone concept under Section 302.102 of the Illinois Water Quality Standards. However, under 302.102(3) and (8) a mixing zone around the Waukegan Coke Plant site is prohibited. In short, mixing is prohibited in public access areas and prohibited for waters which have zero minimum sever day low flow which occurs once in ten years (i.e. a lake). Amend the discussion accordingly.
5. Table 2:
 - Phenanthrene has propped Acute and Chronic AWQC values;
 - naphthalene has LOEL values; and
 - chlorinated naphthalenes have a LOEL value.
 - There are some arsenic values available, depending on the valence state. Identify the valence state(s) present at this site (with literature references or analytical results), and the corresponding criteria available.
 - The hardness of the surface water can be calculated from calcium and magnesium values (Standard Methods for the Examination of Water and Wastewater). The AWQC values can be filled in. There is surface water data contained within the draft Waukegan RAP attached.
6. Table 5: Illinois EPA has promulgated final ground water standards (attached), there are also ground water and soil standards for BETX components under the UST regulations. The ground water standards would be an ARAR, the UST regulations might be a TBC for the BETX contaminants if there no underground tanks. It would be an ARAR if such tanks exist.
7. Table 4: Attached is the Great Lakes Water Quality Agreement (GLWQA) of 1978, as amended by Protocol in 1987, and a copy of the draft stage I Remedial Action Plan (RAP) for Waukegan Harbor.

The GLWQA is an executive agreement with Canada to achieve a level of protectiveness in the Great Lakes. The agreement legally binds the United States to fulfill the commitments made, but does not take precedence over federal statutes. However, Section 118 of the Clean Water Act specifically charges EPA with responsibility for meeting the commitment made by the United States. The GLWQA might be a TBC, the CWA is an ARAR.

The GLWQA results in two planning actions which will eventually effect EPA decisions with regard to the Coke Plant Site. First, the GLWQA calls for the development of a Lakewide Management Plan (LaMP) for critical pollutants for each of the Great Lakes. The draft Lake Michigan LaMP is expected to be published in the Federal Register soon. U.S. EPA has the lead on development of LaMPs. Second, the GLWQA requires the designation of geographic Areas of Concern which are impaired and fail to meet the objectives of the GLWQA agreement. Waukegan Harbor is a designated Area of Concern. These designated areas are required to have RAPs developed and implemented. The Illinois EPA has taken the lead on development of this plan, aided by a Citizens Advisory Group. I have enclosed a draft of their stage I plan. This plan is not yet publicly available. However, it contains technical data relevant to planning phase II for the Coke Plant Site. Any remedy selected at the Coke Plant Site will be consistent with these area-wide plans for controlling toxic loadings to Lake Michigan. However, compliance with ARARs and the risk based objectives may be more stringent.